

Case Name: Gov't Emplees. Ins. Co. v. Ivan Lam, D.C., et al. Case Number: 1:21 CV - 06380 (ARR) (MMH)**PROPOSED DISCOVERY PLAN/SCHEDULING ORDER**

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	3/15/22		
2. Rule 26(a)(1) disclosures exchanged			3/29/22
3. Requested:			
a. Medical records authorization		X	
b. CPL § 160.50 releases for arrest records		X	
c. Identification of John Doe/Jane Doe defendants			8/15/22
4. Procedures for producing Electronically Stored Information (ESI) discussed			TBD
5. Protective Order to be submitted for court approval (see Standing Protective Order on the Chambers website)			TBD
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand			N/A
2. Defendant to make settlement offer			N/A
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)		X	
4. Settlement Conference (proposed date)			
C. PROPOSED DEADLINES			
1. Motion to join new parties			8/15/22
2. Motion to amend pleadings			8/15/22
3. Initial documents requests and interrogatories			TBD
4. All fact discovery to be completed (including disclosure of medical records)			10/14/22
5. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			10/14/22

6. Expert discovery (only if needed)		<i>Check here if not applicable</i> <input type="checkbox"/>	
Plaintiff expert proposed field(s) of expertise:	Medicine, forensic accounting, and billing/coding		
Defendant expert proposed field(s) of expertise:			
	DONE	NOT APPLICABLE	DATE
a. Affirmative expert reports due			11/14/22
b. Rebuttal expert reports due			12/14/22
c. Depositions of experts to be completed			1/14/23
7. Completion of ALL DISCOVERY (if different from C.4)			1/14/23
8. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			1/20/23
9. If any party seeks a dispositive motion , date to a. file request for pre-motion conference (if required), or b. file briefing schedule for the motion			2/28/23
10. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			3/15/23
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motions?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases		x	
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification		x	
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

MARCIA M. HENRY
United States Magistrate Judge

Date